

**Research and
Special Programs
Administration**

(No Date)

Ms. Alyssa Mezebish
Corporate Health Resources, Inc.
804 West Diamond Avenue, Suite 301
Gaithersburg, MD 20878

Dear Ms. Mezebish:

This is in response to your correspondence dated August 4, 1995, pertaining to your company serving as a medical recordkeeper. You indicated in your letter that you set up and monitor medical surveillance programs and replacement exams throughout the country and either store and computerize records, or audit records for completeness and accuracy and return them to your client's medical departments.

For one particular client you add to these functions, monitoring the random drug and alcohol program. You receive medical record, lab reports. These lab reports do not show the employee's name, however, they do have the employee's social security number on them.

QUESTION: It is stated that "confirmed test results must be transmitted directly from the laboratory to the Medical Review Officer (MRO), and not through a consortia or TPA/computer system". Technically, our company is not a consortium, as we only perform this random selection and testing monitoring function for this one client; only their employees are in the random pool. Also, random program management is not our main or sole service. Secondly, we may be considered an extension of the MRO, who we serve directly as he is the Corporate Medical Director for this client.

Answer: The Department of Transportation (DOT), Office of the Secretary (OST), Drug Enforcement and Program Compliance Office has recently written an interpretation pertaining to this matter. You will find attached copies of their responses to this particular question.

If you need any further information please contact Ms. Catrina M. Pavlik, Office of Pipeline Safety at (202) 366-6199 or Mr. Don Shatinsky, OST, Drug Enforcement and Program Compliance Office at (202) 366-3764.

Sincerely,

G. Tom Fortner
Director for Compliance
and State Programs
Office of Pipeline Safety